

# **EXHIBIT 81**

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

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Case No.  
IN RE: SOCIAL MEDIA ADOLESCENT 4:22-MD-03047-YGR  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

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This Document Relates To:

Tucson Unified School District  
v. Meta Platforms Inc., et a  
Case No. 4:24-cv-1382

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VIDEOTAPED 30(b)(6) DEPOSITION OF  
TUCSON UNIFIED SCHOOL DISTRICT  
BY AND THROUGH  
JULIE A. SHIVANONDA

Held At: JW Marriott Tucson  
Starr Pass Resort & Spa  
3800 W. Starr Pass Blvd  
Tucson, Arizona

April 8th, 2025  
2:02 p.m.

Reported By:

MAUREEN O. POLLARD, CA CSR #14449, RDR

1 middle school and high school, who is that?

2 A. Rebecca Carrier.

3 Q. And for all of those positions, are  
4 all of those positions sort of there's just one  
5 person in each position, or are they kind of  
6 like the counselors where there other people in  
7 those positions that you didn't talk to?

8 A. No, they are those of those  
9 positions, correct.

10 Q. Okay. So apart from those people we  
11 just talked about, anybody else other than  
12 counsel that you spoke to to prepare for the  
13 deposition?

14 A. I don't know if that was part of  
15 preparation, but we did meet with an expert,  
16 Dr. Hoover.

17 Q. What's his first name?

18 MR. CUTLER: You can answer.

19 THE WITNESS: I don't remember her  
20 first name.

21 BY MS. DEGTYAREVA:

22 Q. Her first name.

23 And what type of expert is  
24 Dr. Hoover?

25 MR. CUTLER: I'm going to object.

1 Well, I guess if you know you can  
2 answer that question. Go ahead.

3 THE WITNESS: So Dr. Hoover is an  
4 expert in social emotional learning,  
5 mental health, and she is from -- I don't  
6 remember what college she's from, but she  
7 was retained as an expert in the case, is  
8 my understanding.

9 BY MS. DEGTYAREVA:

10 Q. So what was the purpose of your  
11 meeting with Dr. Hoover?

12 MR. CUTLER: I'm going to object to  
13 that to the extent it calls for privileged  
14 communications.

15 BY MS. DEGTYAREVA:

16 Q. So, Ms. Shivanonda, unless your  
17 counsel instructs --

18 MR. CUTLER: Yeah, I'll instruct you  
19 not to answer the question.

20 BY MS. DEGTYAREVA:

21 Q. In terms of preparing for this -- to  
22 testify about the topics that you were  
23 designated for in this deposition, what did you  
24 discuss with Dr. Hoover?

25 MR. CUTLER: Again I'm going to

1 object that it's not part of deposition  
2 preparation.

3 And I'll instruct you not to answer.

4 BY MS. DEGTYAREVA:

5 Q. So just to be clear, did you meet  
6 with Dr. Hoover to prepare for the deposition?

7 MR. CUTLER: I think she answered  
8 that.

9 Go ahead.

10 THE WITNESS: No. In terms of these  
11 topics, in preparation was meeting with  
12 stakeholders within the district. As part  
13 of the larger context there was a meeting  
14 that happened with Dr. Hoover.

15 MR. CUTLER: Which is separate from  
16 this deposition, so I think the questions  
17 are about the deposition preparation.

18 BY MS. DEGTYAREVA:

19 Q. Got it.

20 So in terms of preparation for the  
21 topics that you were designated on for this  
22 deposition, apart from the people we talked  
23 about, and your counsel, anybody else that you  
24 met with to prepare?

25 A. No.

1 Q. I think you said that you also  
2 reviewed some documents. What documents did you  
3 review?

4 A. I reviewed this document to be in  
5 preparation of the topics, as well as Plaintiff  
6 Fact Sheet, as well as interrogatory documents.

7 Q. Did you review any internal TUSD  
8 documents or documents from TUSD databases,  
9 e-mail, anything that wasn't prepared for  
10 purposes of the litigation specifically?

11 MR. CUTLER: Anything not prepared  
12 specifically for the litigation.

13 THE WITNESS: I don't believe it was  
14 not prepared for the litigation, no. This  
15 was in preparation for the litigation.

16 BY MS. DEGTYAREVA:

17 Q. I'm sorry, maybe that was a poorly  
18 worded question.

19 But apart from rog responses, the  
20 PFS, and then the deposition notice, any other  
21 documents you reviewed?

22 A. Yes. Internal documents.

23 Q. What internal documents did you  
24 review?

25 A. Documents around practices in the